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Attorneys for WAYMO LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

vs.

UBER TECHNOLOGIES, INC.;
OTTOMOTTO LLC; OTTO TRUCKING
LLC,

Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF FELIPE
CORREDOR IN SUPPORT OF
DEFENDANTS' ADMINISTRATIVE
MOTION TO FILE UNDER SEAL
PORTIONS OF THEIR REPLY IN
SUPPORT OF MOTION FOR SUMMARY
JUDGMENT AND EXHIBITS THERETO**

1 I, Felipe Corredor, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,
4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set
5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Defendants’ Administrative Motion to File Under
7 Seal Joint Portions of Their Reply in Support of Motion for Summary Judgment and Exhibits Thereto
8 (the “Administrative Motion”). The Administrative Motion seeks an order sealing highlighted
9 portions of Defendants’ Reply in Support of Motion for Summary Judgment (“Defendants’ Reply”)
10 and Exhibits 1-2 to Declaration of Shane Brun, as well as the entirety of Exhibit 3 thereto.

11 3. The green highlighted portions of Defendants’ Reply contain or refer to trade secret
12 information, which Waymo seeks to seal.

13 4. Defendants’ Reply (green highlighted portions) contain, reference, and/or describe
14 Waymo’s asserted trade secrets or information that, from context, tends to disclose Waymo’s asserted
15 secrets. The information Waymo seeks to seal includes the confidential design and functionality of
16 Waymo’s proprietary autonomous vehicle system, including its LiDAR designs, which Waymo
17 maintains as secret. I understand that these trade secrets are maintained as secret by Waymo (Dkt. 25-
18 47) and that the trade secrets are valuable to Waymo’s business (Dkt. 25-31). The public disclosure of
19 this information would give Waymo’s competitors access to descriptions of the functionality or
20 features of Waymo’s autonomous vehicle system. If such information were made public, I understand
21 that Waymo’s competitive standing would be significantly harmed.

22 5. To the extent Velodyne’s request to seal Velodyne trade secrets and/or confidential
23 information is denied, Waymo reserves the right to support sealing portions of Velodyne’s
24 confidential information.

25 6. Waymo’s request to seal is narrowly tailored to those portions of Defendants’ Reply
26 that merit sealing.

1 I declare under penalty of perjury under the laws of the State of California and the United
2 States of America that the foregoing is true and correct, and that this declaration was executed in San
3 Francisco, California, on September 22, 2017.

4 By /s/ Felipe Corredor

5 Felipe Corredor

6 Attorneys for WAYMO LLC
7

8 **ATTESTATION**

9 In accordance with Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this
10 document has been obtained from Felipe Corredor.
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12 By: /s/ Charles K. Verhoeven

13 Charles K. Verhoeven
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